

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

REBECCA BROWN, AUGUST)
 TERRENCE ROLIN, STACY JONES-NASR, and)
 MATTHEW BERGER on behalf of themselves)
 and all others similarly situated,)

Plaintiffs,

V.

CASE NO. 2:20-cv-00064-LPL

TRANSPORTATION SECURITY)
ADMINISTRATION; DAVID P. PEKOSKE,)
Administrator, Transportation Security)
Administration, in his official capacity; DRUG)
ENFORCEMENT ADMINISTRATION;)
TIMOTHY J. SHEA, Acting Administrator, Drug)
Enforcement Administration, in his official)
Capacity; STEVE DAWKIN, Agent, Drug)
Enforcement Administration, in his individual)
capacity; and UNITED STATES OF AMERICA,)

Defendants.

**JOINT MOTION TO EXTEND TIME FOR GOVERNMENT DEFENDANTS
TO ANSWER OR MOVE TO DISMISS THE FIRST AMENDED COMPLAINT AND
FOR PLAINTIFFS TO FILE AN OPPOSITION TO A MOTION TO DISMISS**

Plaintiffs Rebecca Brown, August Terrence Rolin, Stacy Jones-Nasr, and Matthew Berger (“Plaintiffs”) and defendants Transportation Security Agency (“TSA”), TSA Administrator David P. Pekoske, the Drug Enforcement Administration (“DEA”), DEA Acting Administrator Timothy J. Shea, and the United States of America (together, the “Government Defendants”) jointly move for a 3-week extension of time, from August 28, 2020 to September 18, 2020, for the Government Defendants to file either an answer to the first amended complaint

or a motion pursuant to Fed. R. Civ. P. 12, and a corresponding 3-week extension, from October 9, 2020 to October 30, 2020, for Plaintiffs to file their opposition should the Government Defendants file a motion to dismiss.

1. On July 17, 2020, Plaintiffs filed an amended complaint. (ECF No. 43). Plaintiffs' First Amended Complaint is over 100 pages long, includes hundreds of additional paragraphs of allegations, adds two new plaintiffs, and incorporates by reference dozens of new documents.

2. Because of the amount of new material included in the First Amended Complaint, the Government Defendants are still reviewing facts and documents to prepare their response, and it is not feasible for the Government Defendants to file an answer or motion pursuant to Fed. R. Civ. P. 12 by the current August 28, 2020 deadline.

3. Plaintiffs consent to a three-week extension of the Government Defendants' response deadline and seek a corresponding extension of the deadline for Plaintiffs to file a response should the Government Defendants file a motion to dismiss.

4. Government Defendants' counsel has consulted with counsel for the Individual Defendant, Steven Dawkin, and Mr. Dawkin does not oppose this joint motion.

5. Accordingly, the Plaintiffs and the Government Defendants respectfully request that the Court extend the deadline for the Government Defendants to file an answer or motion to dismiss the First Amended Complaint from August 28, 2020, to September 18, 2020, and extend the Plaintiffs' deadline to respond to a motion to dismiss to October 30, 2020.

Dated: August 20, 2020

Respectfully submitted,

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/s/ Elizabeth Tulis
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